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*Attorneys for Defendants under
Limited Notice of Appearance*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FELIPE P. LAZOS, JR.,

Plaintiff,

v.

ERIN PARKS, et al.,

Defendant.

Case No. 3:22-cv-00099-RCJ-CLB

**DEFENDANTS' MOTION FOR
EXTENSION OF TIME
[FIRST REQUEST]**

Defendants Michael Minev and Erin Parks, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and David A. Bailey, Deputy Attorney General, hereby request this Court to extend Defendants' deadline to respond to Plaintiff Felipe Lazos, Jr.'s Emergency Motion (ECF No. 3). This motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), LR 1A 6-1, the following Memorandum of Points and Authorities, and all papers and pleadings on file in this case, and such other and further information as this Court may deem appropriate to consider.

MEMORANDUM OF POINTS AND AUTHORITIES

I. RELEVANT FACTS AND PROCEDURAL HISTORY

This is a pro se prisoner civil rights action brought by inmate Plaintiff Felipe Lazos, Jr. (#67232), currently housed at Lovelock Correctional Center, asserting claims arising under 42 U.S.C. § 1983. ECF No. 8. Following judicial screening under 42 U.S.C. § 1915A,

the Court allowed one claim to proceed alleging deliberate indifference to a serious medical need. ECF No. 7 at 6.

II. ARGUMENT

Courts have inherent powers to control their dockets, *see Ready Transp., Inc. v. AAR Mfg, Inc.*, 627 F.3d 402, 404 (citations omitted), and to “achieve the orderly and expeditious disposition of cases.” *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991). “Such power is indispensable to the court’s ability to enforce its orders, manage its docket, and regulate insubordinate . . . conduct.” *See Wallace v. U.S.A.A. Life General Agency, Inc.*, 862 F. Supp. 2d 1062, 1068 (D. Nev. Sept. 30, 2010) (*citing Mazzeo v. Gibbons*, No. 2:08–cv01387–RLH–PAL, 2010 WL 3910072, at *2 (D.Nev.2010)). LR IA 6-1 discusses requests for continuances. The rule states:

(a) A motion or stipulation to extend time must state the reasons for the extension requested and must inform the court of all previous extensions of the subject deadline the court granted. (Examples: “This is the first stipulation for extension of time to file motions.” “This is the third motion to extend time to take discovery.”)

This is the first request to extend this deadline and is requested for good cause. Defendants’ research into Plaintiff’s claims has revealed that the procedure he has requested has been approved and is in the process of being scheduled. Defendants, therefore, request a seven-day extension of time to respond to Plaintiff’s Emergency Motion.

This request for an additional week to respond will not hinder Lazos’s prosecution of his case. Defendants assert that the requisite good cause is present to warrant the

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1 requested extension of time, and that this request is made in good faith and not for the
2 purpose of delay.

3 DATED this 13th day of May 2022.


4 AARON D. FORD
5 Attorney General

6 By: /s/ David A. Bailey
7 DAVID A. BAILEY, Bar No. 13661
8 Deputy Attorney General

9 *Attorneys for Defendant*

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12 IT IS SO ORDERED.

13 Dated: May 16, 2022

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16 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada and that on this 13th day of May, 2022, I caused to be served a copy of the foregoing,

DEFENDANTS' MOTION FOR EXTENSION OF TIME [FIRST REQUEST], U.S.

District Court CM/ECF Electronic Filing to:

Felipe P. Lazos, Jr., #67232
Lovelock Correctional Center
1200 Prison Road
Lovelock, Nevada 89419-5110

/s/ Karen Easton
An employee of the
Office of the Attorney General